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**To:** [Phlion, Rachel S.](#)  
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**Subject:** RE: Local 2507 et al v. City of New York  
**Date:** Friday, May 23, 2025 1:21:25 PM

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Thank you all, confirming per our discussion today:

Defendant will produce by June 20, 2025 data from 1996 to present requested on demographic data, pay data and open/promotional exam information. Plaintiffs will confirm the datapoints needed for examination data by Wednesday May 28, 2025. Data is needed for examinations on all applicants not just those who passed.

Defendant is agreeing to produce workplace violence information, is actively searching and will provide information to the extent it exists by June 6, 2025.

Defendant will produce missing data dictionary information by June 20, 2025.

Defendant will provide a letter detailing process of locating information regarding the creation of the promotional process from EMS to Fire by June 6, 2025. Parties will discuss meeting and conferring after receipt of this letter if additional efforts could be productive to locate this information.

Defendant has electronically stored EOI data from 2010 forward, although from 2010 to 2015 it may not be complete. Defendant has agreed to produce all electronically stored data. Plaintiffs will advise by May 30, 2025 if they will consent to production of just electronically stored EOIs and not hard copies.

Defendant will provide missing CAD data and Injury/Illness data requested per Plaintiffs' May 9, 2025 letter by May 30, 2025.

Defendant will provide letter on hit information on Plaintiffs' April 14, 2025 proposed ESI search terms by May 30, 2025, Plaintiffs will provide written response by June 3, 2025 and parties will meet and confer at 2pm on June 6, 2025 on this issue. Any issues that can't be resolved through this process with regards to Judge Gorenstein's Order will be submitted in a joint letter on June 20, 2025 parties will work out a briefing schedule on June 6, 2025.

Parties will submit a short joint letter advising Judge Gorenstein on this timing per his 14 day deadlines.

As to the planned May 30, 2025 joint letter re Plaintiffs' 4<sup>th</sup> RFP, Defendant will provide an

updated version of their portion on May 29, 2025. If necessary based on that update parties will schedule a meet and confer or otherwise will address any remaining issues with production at the June 6, 2025 meet and confer scheduled re Judge Gorenstein's ordered production and set a briefing schedule as needed for that joint letter.

Thank you again.

Best,  
Yetta

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**Subject:** RE: Local 2507 et al v. City of New York

Hi Yetta – following up on this. Would you like to speak now, or alternatively I can speak at 9am as I noted below. Please let me know. Thanks.

**Rachel S. Phlion**  
Partner

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